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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

PORTLAND DIVISION

ANDREA OLSON , an individual)	Case No.: 3:15-cv-02216-HZ
)	
Plaintiff,)	PLAINTIFF'S UNOPPOSED MOTION FOR
)	EXTENSION OF TIME TO RESPOND TO
v.)	FEDERAL DEFENDANTS' MOTION FOR
)	SUMMARY JUDGMENT
UNITED STATES OF AMERICA , by)	
and through the Department of Energy)	
and Bonneville Power Administration;)	
and JAMES RICHARD PERRY ,)	
Secretary of the Department of Energy,)	
)	
Defendants.)	
)	

Pursuant to Rule 6(b) of the Federal Rules of Civil Procedure (FRCP), Plaintiff Andrea Olsen moves this Court for an extension of the date to respond to Federal Defendants' Motion for Summary Judgment, listed in the Order granting Plaintiff's Motion for Extension of Time issued by the Court on December 6, 2017. The parties have conferred regarding this motion and Defendant's counsel does not object to this motion.

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1 – PLAINTIFF'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO FEDERAL DEFENDANTS' MOTION FOR SUMMARY JUDGMENT

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On December 22, 2017, by telephone, the counsel for Defendant and the undersigned discussed the need to extend the deadline for Plaintiff to respond to Federal Defendants' Motion for Summary Judgment. This Motion is supported by good cause because the undersigned counsel has just been retained as counsel, as of December 22, 2017, and needs time to formulate a response to the Motion for Summary Judgment.

Based upon the showing of good cause, the Plaintiff requests an order:

1. Allowing a 30-day extension of time from January 3, 2018, up to and including February 2, 2018, to file Plaintiff's Response to Federal Defendants' Motion for Summary Judgment.

This motion is based upon the complete court file and upon the Declaration of David H. Griggs filed herewith.

DATED this 26th day of December, 2017.

GRIGGS LAW GROUP, P.C.

By: /s/David H. Griggs
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